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DEC 13 2011

November 15, 2011

BY HAND

Honorable George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

DEC 12 2011

The oral argument is scheduled for

May 10, 2012 at 10:00 a.m.

SO ORDERED

*George B. Daniels*  
RON. GEORGE B. DANIELS

RE: Tomlinson v. Travelzoo Inc., et al., 11-cv-05531 (GBD)  
Steamfitters v. Travelzoo Inc., et al., 11-cv-06845 (GBD)  
Wang v. Bartel, et al., 11-cv-06125 (GBD)  
Wirth v. Bartel, et al., 11-cv-06378 (GBD)  
Kitt v. Bartel, et al., 11-cv-07019 (GBD)  
Turansky v. Bartel, et al., 11-cv-07389 (GBD)

Dear Judge Daniels:

Pursuant to the Court's direction at the November 8, 2011 conference, we write on behalf of all parties in the above-referenced matters<sup>1</sup> to respectfully submit proposed orders of consolidation for the Securities Action and the Derivative Action as well as a proposed briefing schedule for defendants'

<sup>1</sup> We represent all defendants in the putative class actions, *Tomlinson v. Travelzoo Inc., et al.*, 11-cv-05531 (GBD), and *Steamfitters v. Travelzoo Inc., et al.*, 11-cv-06845 (GBD) (collectively, the "Securities Action"), and defendants Ralph Bartel, Holger Bartel, Christopher Loughlin, Wayne Lee and Nominal Defendant Travelzoo Inc. in the derivative actions, *Wang v. Bartel, et al.*, 11-cv-06125 (GBD), *Wirth v. Bartel, et al.*, 11-cv-06378 (GBD), *Kitt v. Bartel, et al.*, 11-cv-07019 (GBD) and *Turansky v. Bartel, et al.*, 11-cv-07389 (GBD) (collectively, the "Derivative Action").

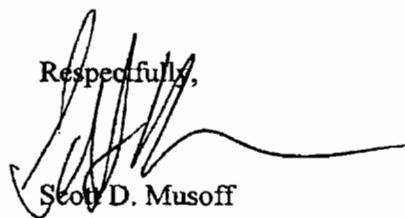
Judge George B. Daniels  
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anticipated motions to dismiss or other response to the consolidated amended complaints.

The parties respectfully propose the following briefing schedule, which in light of plaintiffs' request for sixty days to file consolidated amended complaints in the Securities Action and the Derivative Action so that they can complete their investigation, goes beyond the April 3, 2012 oral argument date tentatively scheduled by the Court. Plaintiffs request 60 days within which to file their complaints because they believe it is necessary for a thorough investigation.

1. Lead Plaintiff in the Securities Action and Lead Counsel in the Derivative Action shall have until and including January 6, 2012 to file and serve consolidated amended complaints;
2. Defendants shall answer, move or otherwise respond with respect to the consolidated amended complaints by March 5, 2012;
3. Lead Plaintiff in the Securities Action and Lead Counsel in the Derivative Action shall file and serve oppositions to Defendants' motions by April 4, 2012; and
4. Defendants shall file and serve any reply papers by April 26, 2012.

The parties remain available at the Court's convenience.

Respectfully,  
  
Scott D. Musoff

cc: Adam S. Hakki, Esq.  
Joseph R. Seidman, Jr., Esq.  
Daniella Quitt, Esq.  
Robert B. Weiser, Esq.